

PILLSBURY WINTHROP SHAW PITTMAN LLP
DAVID M. FURBUSH
2475 Hanover Street
Palo Alto, CA 94304-1114
Telephone: (650) 233-4500
Facsimile: (650) 233-4545

Attorneys for Defendants
SiRF TECHNOLOGY HOLDINGS, INC.,
MICHAEL L. CANNING, DIOSDADO P.
BANATAO, GEOFFREY RIBAR AND
KANWAR CHADHA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SAMMY ESSES, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SiRF TECHNOLOGY HOLDINGS, INC.,
MICHAEL L. CANNING, DIOSDADO P.
BANATAO, GEOFFREY RIBAR and
KANWAR CHADHA,

Defendants.

No. 08 CV 00856 MMC

STIPULATION AND ~~PROPOSED~~
CONSOLIDATION ORDER

BRIAN J. MAJUR, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SiRF TECHNOLOGY HOLDINGS, INC.,
MICHAEL L. CANNING, DIOSDADO P.
BANATAO, GEOFFREY RIBAR and
KANWAR CHADHA,

Defendants.

No. 08 CV 01013 MMC

ALAN NUSSBAUM, On Behalf of Himself
and All Others Similarly Situated,

Plaintiff,

vs.

SiRF TECHNOLOGY HOLDINGS, INC.,
DIOSDADO P. BANATAO, MICHAEL L.
CANNING, KANWAR CHADHA and
GEOFFREY RIBAR,

Defendants.

No. 08 CV 00905 JSW

GARY MITCHELL SCHORR REV. TRUST
U/A DTD 3-20-98, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SiRF TECHNOLOGY HOLDINGS, INC.,
DIOSDADO P. BANATAO, MICHAEL L.
CANNING, GEOFFREY RIBAR and
KANWAR CHADHA

Defendants.

No. 08 CV 01121 MMC

SIDNEY FIELDEN, AS TRUSTEE ON
BEHALF OF THE SIDNEY AND
MILDRED FIELDEN JOINT REVOCABLE
TRUST on behalf of itself and all others
similarly situated,

Plaintiff,

vs.

SiRF TECHNOLOGY HOLDINGS, INC.,
DIOSDADO P. BANATAO, MICHAEL L.
CANNING, KANWAR CHADHA and
GEOFFREY RIBAR,

Defendants.

No. 08 CV 01104 MHP

JAMES FURMAN, Individually And On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SiRF TECHNOLOGY HOLDINGS, INC.,
MICHAEL L. CANNING, DIOSDADO P.
BANATAO, KANWAR CHADHA and
GEOFFREY RIBAR,

Defendants.

No. 08 CV 01122 WHA

RODNEY HUNTER, Individually And On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SiRF TECHNOLOGY HOLDINGS, INC.,
MICHAEL L. CANNING, DIOSDADO P.
BANATAO, GEOFFREY RIBAR and
KANWAR CHADHA,

Defendants.

No. 08 CV 01210 SC

The parties hereby stipulate, and the Court hereby orders, as follows:

CONSOLIDATION OF RELATED CASES

1. The above-captioned actions are related cases within the meaning of Civil L.R. 3-12. Pursuant to FRCiv P. 42(a), these cases are hereby consolidated into Civil Action No. C08-00856 for pretrial proceedings before this Court. The consolidated action shall be captioned: *"In re SiRF Technology Holdings, Inc. Securities Litigation."*

2. Counsel for Defendants hereby accept service of all complaints and summonses in the above-captioned matters pursuant to Federal Rule of Civil Procedure 4(d).

3. All related actions that are subsequently filed in, or transferred to, this District shall be consolidated into this action for pretrial purposes. This Order shall apply to every such related

action, absent order of the Court. A party that objects to such consolidation, or to any other provision of this Order, must file an application for relief from this Order within thirty (30) days after the date on which a copy of this Order is served on the party's counsel.

4. This Order is entered without prejudice to the rights of any party to apply for severance of any claim or action, for good cause shown.

MASTER DOCKET AND CAPTION

5. The docket in Civil Action No. C-08-00856 shall constitute the Master Docket for this action.

6. Every pleading filed in the consolidated action shall bear the following caption:

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

In re SiRF TECHNOLOGY HOLDINGS, INC.
SECURITIES LITIGATION

Master File No.
C 08 00856

CLASS ACTION

This Document Related To:

7. The file in Civil Action No. C08 00856 shall constitute a Master File for every action in the consolidated action. When the document being filed pertains to all actions, the phrase "All Actions" shall appear immediately after the phrase "This Document Relates To:". When a pleading applies only to some, not all, of the actions, the documents shall list, immediately after the phrase "This Document Relates To:", the docket number of each individual action to which the document applies, along with the last name of the first-listed plaintiff in said action (e.g., "No. C-08-00856 (Esses))."

8. The parties shall file a Notice of Related Cases pursuant to Civil L.R. 3-12 whenever a case that should be consolidated into this action is filed in, or transferred to, this District. If the Court determines that the case is related, the clerk shall:

(a) place a copy of this Order in the separate file for such action;

- (b) serve on plaintiff's counsel in the new case a copy of this Order;
- (c) direct that this Order be served upon defendants in the new case; and
- (d) make the appropriate entry in the Master Docket.

LEAD PLAINTIFF'S COUNSEL

9. After the Court has designated a Lead Plaintiff and Lead Plaintiff's Counsel, pursuant to 15 U.S.C. § 78u-4(a)(3), Lead Plaintiff's Counsel shall have authority to speak for, and enter into agreements on behalf of, plaintiffs in all matters regarding pretrial procedures, discovery, and settlement negotiations. Lead Plaintiff's Counsel shall be responsible for coordination of all activities and appearances on behalf of plaintiffs and for dissemination of notices and orders. Lead Plaintiff's Counsel shall be responsible for communications with the Court on behalf of all plaintiffs. Lead Plaintiff's Counsel shall maintain a master service list of all parties and counsel, and service upon Lead Plaintiff's Counsel shall be deemed sufficient to effect service on all plaintiffs.

10. Defendants' counsel may rely upon agreements made with Lead Plaintiff's Counsel. Such agreements shall be binding on all plaintiffs.

PLEADINGS AND MOTIONS

11. Following the appointment of a Lead Plaintiff and Lead Plaintiff's Counsel, the parties shall meet and confer and submit a mutually agreeable schedule for the filing of a consolidated complaint (or designation of an operative complaint), as well as for the briefing and hearing of responses thereto. The consolidated or operative complaint shall supersede all complaints filed in any of the actions consolidated herein.

12. Defendants are not required to respond to the complaint in any action consolidated into this action, other than a consolidated complaint filed by the Lead Plaintiff or a complaint designated as the operative complaint by the Lead Plaintiff.

13. The above-captioned cases have been designated for this Court's Electronic Case Filing Program, and all pleadings and papers shall be electronically served in accordance with the Local Rules and General Orders of this Court regarding Electronic Case Filing. To the extent that any papers are not electronically filed, the Defendants and the Lead Plaintiff shall serve all such papers on each other by hand, by overnight delivery, or facsimile, unless otherwise agreed upon.

1 Notwithstanding the foregoing, and paragraph 9 above, in the event that Defendants elect to serve
2 plaintiffs' counsel other than Lead Plaintiff's Counsel, they may do so by first-class mail, unless
3 otherwise agreed upon by the parties.

4 Dated: March 13, 2008.

5 PILLSBURY WINTHROP SHAW PITTMAN LLP
6 DAVID M. FURBUSH
7 2475 Hanover Street
8 Palo Alto, CA 94304-1114

9 By /s/ David M. Furbush

10 Attorneys for Defendants
11 SIRF TECHNOLOGY HOLDINGS, INC.,
12 MICHAEL L. CANNING, DIOSDADO P.
BANATAO, GEOFFREY RIBAR AND KANWAR
CHADHA

13 Dated: March 13, 2008.

14 COUGHLIN STOIA GELLER RUDMAN & ROBBINS LLP
15 SHAWN A. WILLIAMS
16 100 Pine Street, Suite 2600
17 San Francisco, CA 94111

18 By /s/ Shawn A. Williams

19 Attorneys for Plaintiff
20 SAMMY ESSES, Individually and On Behalf of
All Others Similarly Situated

21 Dated: March 13, 2008.

22 GLANCY BINKOW & GOLDBERG LLP
23 LIONEL Z. GLANCY
24 MICHAEL GOLDBERG
25 1801 Avenue of the Stars, Suite 311
26 Los Angeles, CA 90067

27 By /s/ Michael Goldberg

28 Attorneys for Plaintiff
BRIAN J. MAJUR and On Behalf of All Others
Similarly Situated

1 Dated: March 13, 2008.

2 STULL, STULL & BRODY
3 PATRICE L. BISHOP
4 10940 Wilshire Boulevard, Suite 2300
5 Los Angeles, CA 90024

6 By /s/ Patrice L. Bishop

7 ABRAHAM FRUCHTER & TWERSKY LLP
8 JEFFREY ABRAHAM
9 One Penn Plaza, Suite 2805
10 New York, NY 10119

11 Attorneys for Plaintiff
12 ALAN NUSSBAUM, on Behalf of Himself and All
13 Others Similarly Situated

14 Dated: March 13, 2008.

15 WEISS & LURIE
16 JORDAN L. LURIE
17 LEIGH A. PARKER
18 ZEV B. ZYSMAN
19 10940 Wilshire Boulevard, Suite 2300
20 Los Angeles, CA 90024

21 By /s/ Jordan L. Lurie

22 Attorneys for Plaintiff
23 GARY MITCHELL SCHORR REV. TRUST
24 U/A DTD 3-20-98, Individually and on Behalf of
25 All Others Similarly Situated

26 Dated: March 13, 2008.

27 WOLF HALDENSTEIN ADLER FREEMAN & HERZ LLP
28 FRANCIS M. GREGOREK
BETSY C. MANIFOLD
RACHELE R. RICKERT
MARISA C. LIVESAY
Symphony Towers
750 B Street, Suite 2770
San Diego, CA 92101

By /s/ Betsy C. Manifold

Attorneys for Plaintiff
SIDNEY FIELDEN, AS TRUSTEE ON BEHALF
OF THE SIDNEY AND MILDRED FIELDEN
JOINT REVOCABLE TRUST on behalf of itself
and all others similarly situated

1 Dated: March 13, 2008.

2 GIRARD GIBBS LLP
3 JONATHAN K. LEVINE
4 AARON M. SHEANIN
5 BERNARD J. KORNBERG
6 601 California Street, Suite 1400
7 San Francisco, CA 94108

8 By /s/ Arron M. Sheanin

9 Attorneys for Plaintiff
10 JAMES FURMAN, Individually and On Behalf
11 Of All Others Similarly Situated

12 Dated: March 13, 2008.

13 SCHIFFRIN BARROWAY TOPAZ & KESSLER, LLP
14 ALAN R. PLUTZIK
15 L. TIMOTHY FISHER
16 2125 Oak Grove Road, Suite 120
17 Walnut Creek, CA 94598

18 By /s/ Alan R. Plutzik

19 Attorneys for Plaintiff
20 RODNEY HUNTER, Individually and On Behalf
21 Of All Others Similarly Situated


22 I hereby attest that I have on file all holograph signatures for any signatures indicated by a
23 “conformed” signature (/s/) within this efiled document.

24 /s/ David M. Furbush

25 **ORDER**

26 PURSUANT TO STIPULATION, IT IS **SO ORDERED**.

27 DATED: March 14, 2008

28 
Hon. Maxine M. Chesney
United States District Judge